

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON-3 DIVISION OFFICE

IN RE:

Alice Gwendolyn Woods
aka A G Woods
aka Gwendolyn Winters-Woods
fka A Gwendolyn Winters

DEBTORS

IN PROCEEDINGS UNDER CHAPTER 13

CASE NO: 20-00647-JAW

JUDGE: Jamie A Wilson

**RESPONSE TO NOTICE OF MOTION FOR AN ORDER
DECLARING PHH MORTGAGE CORPORATION (B)(5) CLAIM
DEFAULTS CURED PURSUANT TO THE AMENDED PROOF OF
CLAIM FILED ON MAY 19, 2020**

Now comes the secured creditor, Wells Fargo Bank, N.A., as Trustee for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates Series 2005-WHQ2 (“Creditor”), by counsel, and hereby responds to the notice of motion for an order declaring PHH Mortgage Corporation (B)(5) claim defaults cures pursuant to the amended proof of claim on May 19, 2020, filed by the Debtor regarding the mortgage on 1053 Cherry Stone Circle, Clinton, MS 39056. As of the date of filing this response, the mortgage in question is due for March 1, 2025.

WHEREFORE, Creditor agrees that the mortgage is current, but with outstanding post-petition fees due for March 1, 2025, in the amount of \$1650.00.

Respectfully Submitted,

/s/ Eric C. Miller
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court.

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Torri Parker Martin, Chapter 13 Bankruptcy Trustee
200 North Congress Street, Suite 400, Jackson, MS 39201
tpm@tpmartinch13.com

and by first class addressed to:

Alice Gwendolyn Woods
1053 Cherry Stone Circle
Clinton, MS 39056

_____/s/ Eric C. Miller_____
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